

1 addition to the 21,000,000 or were -- was the indication of
2 the pledge amounts on the first page, 21,000,000, supposed to
3 be the total pledges for TBN, for all projects whatsoever?

4 A I read this that TBN has had an all-time high during
5 its last telethon period. Total pledges received for TBN only
6 were in excess of \$21,000,000. So, I, I take that \$21,000,000
7 figure to be the overall TBN telethon totals.

8 Q So, would that include all special projects?

9 A Yes.

10 Q All right. Now, with that in mind, I recognize this
11 is a bit of a jump, but let's see what we can do. Mass Media
12 Exhibit 50.

13 A Yes, sir. I'm there.

14 Q All right. Now, on pages 20 and 21 --

15 A I'm there.

16 Q -- there are figures for the category of revenue.
17 Do you see that?

18 A Yes.

19 Q And for the figure "Total Revenue," if you go to the
20 very end where it says "Combined," that would appear on page
21 21 --

22 A Yes.

23 Q Do you see a figure of \$22,189,178?

24 A Yes, I see that.

25 Q Now, I know this is for, according to this document,

1 it's for a 17-month period. But would you, would you agree
2 with me that there is an uncanny correlation between the 22-
3 million-plus figure that appears for the Combined Income and
4 the pledge amounts that were made in the November 1980 tele-
5 thon?

6 A I, I think that's pretty much a coincidence, Mr.
7 Shook. Remember, the, the pledges represent a one year dis-
8 creet period of the donor. This is a 17-month actual receipts
9 statement. So, we've got six months difference there that,
10 that would make this a much lower figure.

11 Q Okay. It would make what?

12 A This --

13 Q Try to --

14 A This 1981, December 31, 1981, again, doesn't repre-
15 sent a 12-month, one year, discreet period. This is a --

16 Q No, I recognize that.

17 A -- 17-month period.

18 Q I recognize that.

19 A So, you've got a year-and-a-half's revenue here as
20 opposed to the pledges, which were a 12-month pledge total.

21 Q All right. So, as far as you're concerned, there's
22 no real correlation between the, the two figures, the ones
23 that appear in Mass Media Exhibit 18 and the ones that appear
24 in Mass Media Exhibit 50?

25 A No, sir.

1 JUDGE CHACHKIN: Are we moving to a new subject?

2 MR. SHOOK: Yes, we are, Your Honor.

3 JUDGE CHACHKIN: We'll take a recess till 1:30.

4 (Whereupon, the hearing was to be in recess from
5 12:00 p.m. until 1:30 p.m.)

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A F T E R N O O N S E S S I O N

(1:37 p.m.)

MR. SHOOK: Dr. Crouch, please turn to Mass Media
Exhibit 21.

JUDGE CHACHKIN: What number was that?

MR. SHOOK: 21.

DR. CROUCH: I'm there.

BY MR. SHOOK:

Q Yes. At the outset I recognize that you are not a party to this letter. However, it does concern matters of which you may have some knowledge, and that's why I'm asking you to read through it and then we'll -- I'll ask you a question or two about it.

A I've scanned it generally, Mr. Shook. I'm not sure I understand it, but what is your question?

Q All right. Well, let me see if I can help you with that. It appears to me that there are three entities referenced here, one being Trinity Broadcasting of Texas, one being Translator TV, Inc., and the third being an entity called Dognor, D O G N E R.

A Yes.

Q Now, could you tell me at this point, this is December 1980, what Trinity Broadcasting of Texas is? Because this is long before the Dallas station, so apparently this is some other entity than the one that we are going to become familiar with later on.

1 A There may have been a Trinity Broadcasting of Texas
2 earlier, corporation filed on or about this time. It seems I
3 have a vague recollection of Trinity trying to acquire a, a
4 station in, in Houston, either a low-power or a full-power --
5 I, I'm really drawing a blank on this.

6 Q All right. Well, what this, what this says to me,
7 and you can correct me if I'm wrong, is that this Trinity
8 Broadcasting of Texas is filing for a low-power station on
9 Channel 57 in the Houston area somewhere and that Translator
10 TV, Inc., is also seeking a channel in the Houston area, that
11 being on Channel 56.

12 A Yes.

13 Q Am I to understand that essentially Trinity
14 Broadcasting of Texas was going to be on one side of the
15 Houston market and Translator TV, Inc., was going to be on the
16 other side, but in any event, as a result, the Houston market
17 was going to be able to get Trinity Broadcasting Network's
18 television programming?

19 A I believe that is the case.

20 Q Now, what I would like to focus your attention on
21 here is the last paragraph on the first page, and recognize
22 that this letter is coming from Joe Dunne, who at this time is
23 employed at Gammon and Grange. He says, "The primary interest
24 of our client..." Now, would you have any knowledge as to
25 what he's referring to here in terms of "our client"?

1 A Well, I, I presume it's Trinity Broadcasting.

2 Q Well, take, take your time so that you feel com-
3 fortable with your answer.

4 A Well, since he says it's, "The primary interest of
5 our client to ensure the widest coverage of KTNB's signal..."
6 KTNB, of course, is our mother station in southern California,
7 I have to conclude that he is speaking at least partly on
8 behalf of Trinity Broadcasting.

9 Q Would it be fair to presume from the information in
10 this letter that Translator TV, Inc., and Trinity Broadcasting
11 of Texas are working in concert in some fashion?

12 A They may have been working in concert or just both
13 working to achieve some coverage in the Houston market. I, I
14 really don't know.

15 Q Well, stepping back, stepping back in time, we're
16 now in late 1980. Translator TV, Inc., has just been birthed.

17 A Yes.

18 Q Applications are being filed. And we have now two
19 applications from related, I'll use that word -- you don't
20 have to agree with me -- but related companies, that being
21 Trinity Broadcasting of Texas and Translator TV, Inc., for
22 Houston, and what I'm asking you is can you remember how it
23 came about that these applications were filed and that there
24 was some differentiation, obviously, as to which company was
25 going to be filing on which channel and for which part of the

1 Houston market, if you can recall any process of the people
2 who were involved in determining where the applications were
3 going to be filed?

4 A No, sir. I, I'm sorry. I can't.

5 Q Next, I'd like to direct your attention to Mass
6 Media Exhibit 25.

7 A Yes, sir. I'm there.

8 Q Now, I know this is a little difficult to read
9 because, at least in my copy, the, the print is somewhat
10 faded, but what I'd like you to focus on is the second para-
11 graph following the words "beloved partners."

12 A Does that begin, "I have ordered today the final
13 engineering..."?

14 Q No. It begins, "Last year, 1980..."

15 A Oh, yes. Yes, I see it. "Last year, 1980, saw 10
16 new stations go on the air, almost one a month."

17 Q Right.

18 A Yes, sir. I'm there.

19 Q Okay. Now, in that sentence, it reads, "We have
20 filed new FCC applications for 25 more cities across America
21 and applications for 15 more are in preparation." Now, turn-
22 ing to the next page so that -- it appears to me, and I'm not
23 -- actually, I don't know, maybe you can tell me, can you tell
24 me who wrote this first page here? Do you have any knowledge
25 as to the author of this is?

1 A Page, page 1 of this Praise the Lord Newsletter?

2 Q Yes, sir. And in order to help you with that, if
3 you turn to page 4 at the top, you will note it says, "Paul's
4 letter continued from page 1..."

5 A Um-hum.

6 Q And then when you go down three-quarters of the
7 page, there is a signature of a person named Paul.

8 A Yes. No, I am the author of that.

9 Q You're the author of that?

10 A Yes, sir.

11 Q Now, can you tell me in the sentence that I read to
12 you who the "we" is?

13 A Yes. In the earliest days of Trinity, and for
14 several years, on the wall of our primary set was this little
15 motto: "TBN belongs to God's People." And in the very real
16 practical sense, it does, because if they ever stopped sup-
17 porting, there will be no TBN or, or nor will there be any
18 ministry. So, I think one of the keys to the success of
19 Trinity is I have brought the partners and supporters and the
20 viewers of Trinity into the picture. We, we go do this. We
21 go do that. We file for this. We build a foreign station.
22 We, we, we, meaning in the broadest sense of the term, the
23 partners, the viewers, and the supporters, in addition, of
24 course, to the various entities, owned and operated stations,
25 affiliated stations, et cetera, et cetera, low-power, full-

1 power, educational, cable. So, in this context here, I am, I
2 am saying "we" are doing this, "we" are filing, together "we"
3 are doing this. And, of course, if you will read the entire
4 newsletter, I'm eliciting their support so that "we" can do
5 all of these, these wonderful things that I am enumerating.

6 Q So, would the "we" here include both Trinity and
7 Translator TV, Inc.?

8 A Undoubtedly.

9 Q Now, turning to page 4, down at the bottom under-
10 neath the large script phrase, "Our love gift to you," there
11 is a listing of addresses. Do you see that?

12 A Yes.

13 Q Now, what, what is the common thread among those
14 addresses, if anything?

15 A Well, I, I see these as being basically the Trinity
16 Broadcasting owned and operated stations.

17 Q Very good.

18 A And it's also designed to guide the viewers in those
19 areas to the actual address of the, the local studios for
20 visitation purposes.

21 Q All right. Next, I would like to direct your atten-
22 tion to Mass Media Exhibit 26.

23 A Yes, sir.

24 Q Now, the Minutes that we have here are for Trinity
25 Broadcasting Network, and they are only one page in length.

1 Do you have any recollection of whether the owned and operated
2 companies were part of a joint meeting that took place on this
3 day or did it occur in 1981 that only Trinity Broadcasting
4 Network met?

5 A I, I have to assume from the heading up here that it
6 was simply the Broadcasting -- Trinity Broadcasting Network,
7 Inc.

8 Q Now, in the middle of the paragraph, or the middle
9 of the, the Minutes, rather, rather, there's a paragraph that
10 reads, "The Board considered the audited Financial Statements
11 as presented by the Corporate President and approved same."
12 Do you see that?

13 A Yes.

14 Q Now, would it have been your practice at an Annual
15 Meeting to present financial statements, audited or not, to
16 the Board for them to look at?

17 A Oh, yes.

18 Q And in the course of considering financial state-
19 ments, what would, what would typically have happened?

20 A Two things. Since it takes some months to -- for
21 the auditors to complete the complete final audited statement,
22 we would probably have been reviewing here the 1979 audited
23 statement and the 1980 unaudited statement.

24 Q Now, in the course of considering the statements,
25 was there any pattern or practice as to what would be consid-

1 | ered? Obviously, in a financial statement there's a lot of
2 | information and it, it may be that certain aspects of it are
3 | much more focused on than others. Was there any, anything
4 | that would normally occur relative to consideration of a
5 | financial statement?

6 | A I would typically go down -- treat the balance sheet
7 | first, show the basic list of assets as opposed to the basic
8 | list of liabilities, and, and point out any special or unusual
9 | things. Then we would -- I would typically point out the --
10 | what we call the P&L, the -- this is a wrong statement, but
11 | for sake of understanding here, in a nonprofit corporation you
12 | don't really have a, a profit and loss, but you have an over
13 | or under excess of, of revenues, so we would typically consi-
14 | der that and consider the total amount of revenues that had
15 | come in during the course of that -- the years under discus-
16 | sion, the expenses. But in a, in a, in a Board meeting, my
17 | experience is you don't get terribly bogged down in a, in a
18 | lot of heavy detail. You look at the big numbers, the bottom
19 | line.

20 | Q So, in terms of the corporations, the thought would
21 | be well, okay, for Corporation A the income is exceeding the
22 | expenses or the converse --

23 | A Yes.

24 | Q -- and then, secondarily, whether the Fund Balance
25 | is positive or negative?

1 A Those are the primary considerations, yes, sir.

2 Q Now, moving on to the last substantive paragraph,
3 there -- well, actually, there's -- the last three substantive
4 paragraphs have references to Tri-State in here, but what I'd
5 like you to focus on is the last paragraph, for the moment,
6 the last substantive paragraph.

7 A Yes. I've seen that.

8 Q Now, at this point in time, Tri-State is a corpora-
9 tion that is totally unconnected with Trinity, is it not?

10 A Yes, sir.

11 Q All right. I'd like to move on to Mass Media
12 Exhibit 28. And if you would, just, you know, scan the docu-
13 ment quickly to give yourself an idea of what this is, and I
14 can help you in that sense. It appears from what we have that
15 it is an amendment to an existing application of -- or a
16 pending application of Translator TV, Inc.

17 A Yes.

18 Q And what I would like you to focus on is page 7,
19 specifically, the first sentence of the letter. Now, would it
20 be the normal practice for Trinity Broadcasting Network, if it
21 makes such a resolution as that noted here, to have that
22 resolution reduced to writing in some Board action?

23 A Typically, yes.

24 Q But would it also be -- would it also take place
25 that on occasion it would not be reduced to Minutes or some

1 kind of reflection of Board action outside of what appears in
2 this letter?

3 A For a transaction this size, Mr. Shook, there, there
4 certainly should be some written record or minute concerning a
5 transaction like this.

6 Q Now, the flip side, and by the flip side I mean
7 Translator TV, Inc., seeking money of this amount, should that
8 -- should there also be Board Minutes for Translator TV, Inc.,
9 in which the Board resolves or agrees or comes to some conclu-
10 sion that they could seek a loan of this size?

11 A There probably should have been some resolution or
12 minute for Translator TV, Inc., to have received this kind of
13 a commitment, although earlier we saw that the Board had
14 authorized it to commence the pursuit of low-power TV sta-
15 tions. So, I'm not a lawyer. I don't know if that would have
16 been a legal necessity or just a good business decision.

17 Q Well, I'm, I'm thinking of it more in terms of what
18 the practice of the company was, whether there would have
19 been, considering the amount of money in question, a specific
20 resolution that says we empower our officers or we empower a
21 particular officer to, you know, make a commitment of this
22 amount or to seek money of, of this amount.

23 A It is certainly my feeling that a transaction of
24 this type should have been supported by some action of the
25 Board, by some minute of the corporation.

1 Q Now, I notice that there's a signature down at the
2 bottom of the page. I take it that signature is yours?

3 A Yes.

4 Q Do you have any recollection as to how this letter
5 came to be?

6 A As I peruse it, Mr. Shook, I have a feeling that it
7 would have been part of a, an exhibit presented to the Agency
8 to show Translator TV, Inc.'s financial ability to perform the
9 building of these permits should they be granted.

10 Q So, that there was some advice, legal advice, pro-
11 vided from Trinity's lawyers that a document of this nature
12 had to be prepared?

13 A There may have been. I, I think it was well-known
14 to myself even at this time that you had to support to the
15 Agency your financial ability to construct.

16 Q And what I'm thinking of is more specific to this
17 letter, and that is can you recall the process by which this
18 letter was prepared?

19 A No, sir.

20 Q Let's move on to Mass Media Exhibit 31. I will
21 alert you immediately that the copy that I have and that what
22 you have reflects on page 2 that there was no signature. So,
23 what I don't know, and perhaps you can tell me, is what, if
24 any, involvement you had in this document and what happened as
25 a result?

1 A Well, sir, I, I honestly don't have any recollection
2 of this, but it would appear that the Internal Revenue Service
3 must have had some additional questions to Mr. Juggert's
4 initial Application for Exemption, and this appears to me to
5 be Mr. Juggert's response to that, albeit over my signature.
6 Now, I may have signed an original that went to the Agency.
7 Typically, I guess that could have happened, and this unsigned
8 copy may have been the only file copy left. I, I'm only
9 speculating, sir.

10 Q Very good. Please turn to Mass Media Exhibit 32.

11 A Yes, sir.

12 Q I'd like you to focus on the first two paragraphs.

13 A Yes. I, I've read them.

14 Q There are two references there to Jerry. Do you
15 know who Jerry is and what this is about?

16 A Yes. This is Reverend Jerry Bernard, B E R N A R D.
17 He is a pastor in San Diego, California.

18 Q Now, it says there was a Translator TV, Inc., appli-
19 cation filed for Channel 60 in San Diego and there's a refer-
20 ence there to Jerry's objections. Are they related in some
21 fashion? Can you -- do you know what that's all about?

22 A All I know is that Pastor Bernard was desirous of
23 acquiring a, a TV station of his own down in San Diego, and he
24 was a, a good friend and a frequent guest on the -- and even a
25 host, one of the guest hosts of the "Praise the Lord Program."

1 So, I do vaguely recall that he preferred that, that we not
2 file down there but allow him to attempt to acquire some
3 station.

4 Q All right. So, in terms of Reverend Bernard filing
5 on Channel 43, that was not for TBN programming? That was for
6 something that Reverend Bernard had in mind?

7 A To the best of my knowledge, it was.

8 Q I'd like you to turn to Mass Media Exhibit 33.

9 A Excuse me. Yes, sir. I'm there.

10 Q Now, in the second paragraph, you see the reference
11 to Paul?

12 A Yes, sir.

13 Q Now, that Paul is you, correct?

14 A It is.

15 Q Then what is it -- can you tell us what it is that
16 is supposed to happen here or what did you wish to have
17 happen?

18 A "Paul wishes to pursue the filing of the translator
19 applications that you are holding in your files with the
20 exception of Tulsa." As best I can remember, some of these
21 applications were being held in our attorney's files back
22 there because we just didn't have the financial capacity to
23 really put them on file and represent to the Commission we had
24 that capacity.

25 Q Do you know whether the applications in question

1 included applications both for TBN and for Translator TV?

2 A They certainly may have. I, I, I'm not sure if this
3 letter references both.

4 Q You know, the letter isn't clear. That's why I'm
5 asking.

6 A I, I, I'm unable to answer that, sir.

7 Q Next, I'd like you to turn to Mass Media Exhibit 35.

8 A Yes, sir.

9 Q Now, this is an authorization -- Tax Information
10 Authorization for Translator TV, Inc., that Mr. Juggert is
11 sending you. Is this something that would -- that Mr. Juggert
12 typically would bring to your attention relative to Trinity
13 and related companies?

14 A Yes. Mr. Juggert typically prepared all of the IRS
15 exemption filings.

16 Q Next, I'd like you to turn to Mass Media Exhibit --
17 let me check my notes here to see which one it is.

18 (Pause.)

19 BY MR. SHOOK:

20 Q Mass Media Exhibit 38.

21 A Yes, sir. I'm there.

22 Q Now, this is the Form 990 for Translator TV, Inc.,
23 for the year 1980. This is the primary form that the
24 corporation would file with the IRS on an annual basis?

25 A I believe that is the case.

1 Q In terms of the figure that appears in part one for
2 contributions, gifts, grants, et cetera, the \$31,000 figure, I
3 take it that represents the amount of income that Translator
4 TV, Inc., had for the year 1980?

5 A I believe that that was the portion of the telethon
6 income that was raised through Trinity for Translator TV, Inc.
7 I, I believe that's the case, sir.

8 Q That was the income that was actually received by
9 December 31, 1980?

10 A Yes.

11 Q At this point we're not talking about something
12 pledged; we're talking about something that's actually in?

13 A Yes, sir.

14 Q Did you review this document in any fashion before
15 it was filed with the IRS?

16 A I certainly have no independent memory of reviewing
17 this. I typically leave this to our auditors to see that
18 these are properly filled out and filed.

19 Q Would there have been, to your knowledge, anyone at
20 Translator TV, Inc., recognizing that at this point it's just
21 yourself, Mrs. Duff, and Reverend Espinoza, who would have
22 looked at this prior to its filing with the IRS?

23 A They may have, but I have no independent knowledge
24 of that.

25 Q Now, before when you made reference to "our

1 | auditors," that was TBN's auditors, correct?

2 | A TBN's and affiliated companies' auditors.

3 | Q Next, I'd like you to turn to Mass Media Exhibit 39.

4 | A Yes, sir.

5 | Q At the top there is a listing of stations. I, I
6 | take it those are the owned and operated stations?

7 | A Yes.

8 | Q Now, moving on to the bottom of page 1, I don't --
9 | it's not a complete sentence here, but what I do have -- I
10 | never could find page 2 of this newsletter. What I have -- I
11 | have no idea what this other page is that I have. But looking
12 | at what I have here at the bottom of page 1, it reads: "Of
13 | course, these seven do not count for the 17 low-power transla-
14 | tor stations already on the air or the 26 medium-power sta-
15 | tions which we have filed with the FCC, et cetera. Now, the
16 | 26 medium-power stations that are referenced here, are those
17 | stations that were sought by both TBN and Translator TV?

18 | A They, they could have been, I, I really cannot tell
19 | from this text.

20 | Q Well, let's think of it in terms of trying to focus
21 | on time and, and what would have taken place. The newsletter
22 | is for July 1981 and we are aware from previous exhibits of
23 | filings that were made on behalf of Trinity and other such
24 | companies and Translator TV, Inc. --

25 | A Yes.

1 Q -- in late 1980 and early 1981. And what I'm trying
2 to determine is whether the reference here to the 26 medium-
3 power stations relates to those applications filed by Trinity
4 and by Translator TV.

5 A It certainly could have --

6 Q Okay.

7 A -- but I, I have no way of knowing from this text if
8 that is absolutely the case.

9 Q Do you have knowledge of any other applications that
10 were filed by or on behalf of Trinity and/or related companies
11 during this period of time?

12 A Other than Trinity and Nat-- and TTI?

13 Q Correct.

14 A No, sir.

15 Q Now, this essentially is the same information,
16 moving into Mass Media Exhibit 40. Again, the listing of
17 stations at the top are the owned and operated stations,
18 correct?

19 A Yes, sir.

20 Q And after "beloved partners," the second paragraph,
21 which begins, "Partners, please pray, as you may know, we have
22 filed for 26 more of these satellator stations and await FCC
23 action on them." Would I be correct that the reference to the
24 26 there is inclusive of the Translator TV, Inc., stations?

25 A Again, Mr. Shook, they, they certainly could have

1 | been, but I cannot determine from this text if that is exactly
2 | the case.

3 | Q I'd like you to turn to Mass Media Exhibit 42.

4 | JUDGE CHACHKIN: When, when you say you're not sure,
5 | is it because you don't know which of the stations were filed
6 | in that period, whether they were TTI or TBN?

7 | DR. CROUCH: That is -- that's correct, Your Honor.

8 | JUDGE CHACHKIN: Well, if there were TTI stations
9 | filed in that period, they would be included in the news-
10 | letter, would they not, as part of the stations?

11 | DR. CROUCH: I believe they would have been, yes.

12 | BY MR. SHOOK:

13 | Q Mass Media Exhibit 42.

14 | A Yes, sir. I'm there.

15 | Q Now, if, if memory serves, Mrs. Duff became a member
16 | of the TBN Board sometime in 1979, became a member of the
17 | Board of Trinity Broadcasting of Florida either in '79 or in
18 | 1980, became a member of the Board of Translator TV, Inc., in
19 | September of 1980, and now we're up to September of 1981, at
20 | which time she's becoming an Officer and Director of Trinity
21 | Broadcasting of Arizona. Do you see this?

22 | A Yes, I see that.

23 | Q Now, can you tell me how it came about that Mrs.
24 | Duff became an Officer and Director of Trinity Broadcasting of
25 | Arizona?

1 A No, sir, I can't, and I am drawing a blank. I, I, I
2 knew that she was an Assistant Secretary for virtually the
3 whole range of Trinity affiliated organizations, but I declare
4 to you I didn't think she ever was a full-fledged Director of
5 Trinity of Arizona.

6 Q Well, the records will reflect that she was so for
7 at least several years. But what I'm focusing on here is how
8 she became a director, if you can recall how that came about?

9 A No, sir. I, I cannot. My understanding was she was
10 an Assistant Secretary, but I just do not have any recollec-
11 tion of her becoming a full-fledged Director of Trinity of
12 Arizona.

13 Q So, I take it, then, you would not know how she was
14 presented in the sense that, say, you as President nominated
15 her for Board membership or whether that occurred through
16 somebody else?

17 A I have no recollection of this at all.

18 Q Now, I have no similar document for Oklahoma City.
19 Would you have any reason to know -- or do you have anything
20 to say about whether she became a Director of Oklahoma City,
21 and if so when, and if so how that happened?

22 A My answer would be the same for Oklahoma as for
23 Arizona.

24 Q You're in the dark?

25 A Yes, sir.

1 Q I'd like you to turn to Mass Media Exhibit 43.

2 A Yes, sir. I'm there.

3 Q All right. On the first page we have the list of
4 owned and operated stations at the top.

5 A Yes, sir.

6 Q And this is for October of 1981. And if you turn to
7 what I have marked here as page 6 of the exhibit, there's a
8 reference to something called "Praise-a-thon '81 Projects."

9 A Yes, sir. I'm there.

10 Q All right. Now, do you notice what the second
11 project is?

12 A Yes. Low-power broadcast stations.

13 Q And would I be correct that the cities mentioned are
14 Translator TV, Inc., cities?

15 A They, they may have been, but I would have to review
16 the applications to be sure.

17 Q Well, let's do that.

18 JUDGE CHACHKIN: Well, could we stipulate that these
19 are TTI cities?

20 MR. TOPEL: If Mr. Shook so represents.

21 JUDGE CHACHKIN: I think we've already --

22 MR. TOPEL: If, if, if this is --

23 JUDGE CHACHKIN: -- had testimony in the record to
24 that --

25 MR. TOPEL: Excuse me?

1 JUDGE CHACHKIN: -- effect. I think we've already
2 had testimony for the record --

3 MR. TOPEL: The list, the list is in the record.
4 So, if Mr. Shook so represents, I --

5 JUDGE CHACHKIN: All right. Rather than spend time
6 looking at it, that's the case. Go ahead. We'll assume that
7 to be the fact subject to check if --

8 BY MR. SHOOK:

9 Q Now, do you recall any efforts made to raise funds
10 for translator station applications in connection with the '81
11 telethon?

12 A I have no independent recollection, but if it's a, a
13 project in the newsletter here, there, there probably were
14 some funds raised for that.

15 Q That the chances are excellent, in fact, aren't they
16 that if it appeared in the newsletter it was also a subject of
17 the telethon?

18 A Yes.

19 Q Now, did you have any involvement in authoring the
20 little section that we have just noticed here about low-power
21 broadcast stations?

22 A No, sir. I always authored the, the main article --
23 copy and a few things, but the captions are almost without
24 exception authored by somebody else.

25 (Off the record.)

1 (On the record.)

2 Q Would you have reviewed this?

3 A Probably.

4 Q Now, going down to the bottom of the page, do you
5 see a reference for a program called "Felicidad"?

6 A Yes, sir.

7 Q Do you recall how it came about that the reference
8 to "Felicidad" was included here?

9 A It, it was a program that was sponsored and produced
10 by Trinity Broadcasting for -- and Pastor David Espinoza was
11 the, the host of that program.

12 Q Did you have any involvement in preparing the cap-
13 tion?

14 A No, sir.

15 Q Do you rec-- have any recollection of having re-
16 viewed the caption?

17 A No, sir.

18 Q Would it have been typical, though, for you to have
19 so reviewed it?

20 A Yes, sir.

21 Q Moving on to Mass Media Exhibit 44, the first resol-
22 ved paragraph. There's a reference here to \$3,000,000 for
23 Trinity Broadcasting of New York. Do you see that?

24 A Yes, sir.

25 Q Would I be correct that that \$3,000,000 would not